

United States Bankruptcy Court
Northern District of Illinois, Eastern Division

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| IN RE: Tasos V Maroulis |) | Chapter 13 |
| |) | Case No. 19 B 26620 |
| Debtor(s) |) | Judge Timothy A Barnes |

Notice of Motion

Tasos V Maroulis
168 Dulles Rd
Des Plaines, IL 60016

Debtor Attorney: Cutler & Associates Ltd
via Clerk's ECF noticing procedures

On December 12, 2019 at 10:30 am, I will appear at the location listed to the right, and present this motion.

> Dirksen Federal Building
> 219 South Dearborn
> Courtroom 744
> Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Wednesday, November 13, 2019.

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

Motion to Dismiss Case For Unreasonable Delay

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 09/19/2019.
2. The debtor(s) have failed to begin payments within thirty days of filing the plan as required under 11 U.S.C. §1326(a) (1).
3. The debtor(s) have failed to file a feasible plan. The proposed plan now runs 74 months.
4. The debtor failed to amend the plan to address the student loans.
5. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE